

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
SOUTHERN DIVISION**

Kathleen Bliss, on behalf of herself, the Proposed Nationwide Rule 23 Class, and the Proposed Nevada Subclass,

Case No. 2:18-CV-01280-JAD-EJY

Plaintiff,

V.

CoreCivic, Inc.,

Defendant.

**STIPULATION TO EXTEND
DEADLINES
(Third Request)**

The parties respectfully request that the Court adopt the modifications to the scheduling order set forth below with respect to Defendant's class certification expert disclosures and both parties' class certification briefing:

1. Deadline for Defendant's class certification expert disclosures extended from October 14, 2022, until February 17, 2023.

2. Class certification briefing schedule modified as proposed in the table below:

Filing	Current Deadline	Proposed Deadline
Plaintiff's opening class certification brief	December 19, 2022	March 31, 2023
Defendant's class certification response brief	January 2, 2023 (14 days after the opening brief is filed)	May 1, 2023 (30 days after the opening brief is filed)
Plaintiff's class certification reply brief	January 9, 2023 (7 days after the response brief is filed)	May 31, 2023 (30 days after the response brief is filed)

This is the third request to extend time to file Defendant’s class certification expert disclosures and the parties’ class certification briefs. (See ECF Nos. 86 and 155 (the parties’ previous requests).) The existing schedule has been in place since October 4, 2021. (ECF No. 156.) Since that time, the parties made significant progress on discovery necessary for class certification

1 and reached a stipulation regarding Defendant's use of certain non-ESI documents to argue against
 2 class certification. (ECF No. 215.) Accordingly, the primary outstanding discovery that is relevant
 3 to class certification is from third-party telephone vendors and state bar associations, and from
 4 recently disclosed witnesses. The parties make this request because of issues that have arisen with
 5 the aforementioned third-party discovery (including issues related to data production and
 6 deposition scheduling conflicts), Plaintiff's desire to take depositions of certain of Defendant's
 7 recently disclosed witnesses, and ongoing work through the agreed upon ESI protocol.

8 Date: October 14, 2022

9 NICHOLS KASTER, PLLP

10 s/ Charles J. O'Meara

11 Matthew H. Morgan* MN Bar No. 304657
 12 Anna P. Prakash* MN Bar No. 0351362
 13 Charles A. Delbridge* MN Bar No. 0386639
 14 Rebekah L. Bailey* MN Bar No. 0389599
 15 Charles J. O'Meara* MN Bar No. 0402777
 16 NICHOLS KASTER, PLLP
 17 4700 IDS Center
 18 80 South 8th Street
 19 Minneapolis, MN 55402
 20 Tel: 612.256.3200
 21 morgan@nka.com
 22 aprakash@nka.com
 23 cdelbridge@nka.com
 24 bailey@nka.com
 25 comeara@nka.com

26 NICHOLS KASTER, LLP
 27 Matthew C. Helland* CA Bar No. 250451
 28 235 Montgomery St., Suite 810
 San Francisco, CA 94104
 Telephone: (415) 277-7235
 helland@nka.com

29 Michael Hodgson* MO Bar No. 63677
 30 THE HODGSON LAW FIRM, LLC
 31 3609 SW Pryor Road
 32 Lee's Summit, MO 64082
 33 Tel: 816.600.0117
 34 mike@thehodgsonlawfirm.com

35 Lance D. Sandage* MO Bar No. 46022
 36 SANDAGE LAW LLC

STRUCK LOVE BOJANOWSKI &
 ACEDO, PLC

s/ Anne. M. Orcutt

Daniel P. Struck
 Rachel Love
 Jacob B. Lee
 Ashlee B. Hesman
 Anne M. Orcutt
 Eden G. Cohen
 3100 West Ray Road, Suite 300
 Chandler, AZ 85226
 dstruck@strucklove.com
 rlove@strucklove.com
 jlee@strucklove.com
 ahesman@strucklove.com
 aorcutt@strucklove.com
 ecohen@strucklove.com

Gina G. Winspear
 DENNETT WINSPEAR
 3301 North Buffalo Dr., Suite 195
 Las Vegas, NV 89129
 gwinspear@dennettwinspear.com

Attorneys for Defendant CoreCivic, Inc

1600 Genesee Street, Suite 655
Kansas City, MO 64102
Tel: 816.753.0800
lance@sandagelaw.com

Joseph K. Eischens* MO Bar No. 44706
LAW OFFICE OF JOSEPH K. EISCHENS
8013 Park Ridge Dr.
Parkville, MO 64152
Tel: 816.945.6393
joe@jkemediation.com

Paul S. Padda
NV Bar No. 10417
PAUL PADDA LAW, PLLC
4560 South Decatur Blvd., Suite 300
Las Vegas, NV 89103
Tel: 702.366.1888
psp@paulpaddalaw.com

*Admitted pro hac vice

Attorneys for Plaintiff and the Proposed Classes

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: _____